

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

19 CR 375 (SJ)

CHRISTIAN TRUNZ

Defendant.

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**GOVERNMENT’S THIRD UNOPPOSED MOTION
TO CONTINUE THE DEFENDANT’S SENTENCING HEARING**

The United States of America respectfully submits this Third Unopposed Motion to Continue the Defendant’s Sentencing Hearing (the “Motion”) and states as follows:

1. On August 20, 2019, the defendant pled guilty, pursuant to a plea agreement, to an information charging one count of conspiracy to engage in spoofing, in violation of 18 U.S.C. § 371, and one count of spoofing, in violation of 7 U.S.C. §§ 6c(a)(5)(C) and 13(a)(2).
2. The defendant is not in custody and was released on his own personal recognizance with conditions pending sentencing.
3. Sentencing in this matter is currently scheduled for September 10, 2020.
4. The defendant is cooperating with the Government and is expected to testify in an ongoing case in the Northern District of Illinois, which currently is scheduled for trial on April 5, 2021.
5. The Government respectfully requests that the sentencing hearing be continued for six months, to March 10, 2021, in order to allow the defendant to continue his cooperation.
6. The undersigned has conferred with counsel for the defendant. The defendant has no objection to the requested relief.

For the foregoing reasons, the government respectfully requests that the Court grant this Third Unopposed Motion to Continue the Defendant's Sentencing Hearing.

Dated: August 31, 2020

Respectfully submitted,

ROBERT A. ZINK
Chief, Fraud Section
Criminal Division
U.S. Department of Justice

By: /s/Matthew F. Sullivan
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CERTIFICATE OF SERVICE

I hereby certify that, on August 31, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, and that the foregoing document is being served this day on all counsel of record via transmission of Notice(s) of Electronic Filing.

By: /s/Matthew F. Sullivan
Matthew F. Sullivan
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